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Attorneys for Defendant and Counter-Claimant
CHECKMATE.COM INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ARJUN VASAN,

Plaintiff,

v.

CHECKMATE.COM, INC.,

Defendant.

CHECKMATE.COM, INC.,

Counterclaim-Plaintiff,

v.

ARJUN VASAN,

Counterclaim-
Defendant.

Case No. 2:25-cv-00765-MEMF-AS

Hon. Alka Sagar

DISCOVERY MATTER

**DECLARATION OF REBECCA I.
MAKITALO IN SUPPORT OF
CHECKMATE.COM INC.'S
REPLY TO PLAINTIFF ARJUN
VASAN'S OPPOSITION (DKT.
111) AND IN SUPPORT OF
MOTION TO ENFORCE AND
COMPEL COMPLIANCE WITH
SUBPOENA TO VASAN
VARADARAJAN AND FOR
CONTEMPT**

Complaint Filed: January 28, 2025
Amended Complaint Filed: February
21, 2025

DECLARATION OF REBECCA I. MAKITALO

I, Rebecca I. Makitalo, declare as follows:

1. I am an associate attorney at the law firm of K&L Gates LLP, counsel for Defendant and Counter-Claimant Checkmate.com, Inc. (“Defendant” or “Checkmate”) in the above-titled matter. I am duly licensed to practice law in the State of California and before the United States District Court for the Central District of California and am responsible for representing said Defendant in this action. Except where otherwise indicated, all of the information contained herein is based upon my personal knowledge and if called and sworn as a witness, I could and would competently testify thereto.

2. During the pendency of this litigation, Checkmate’s counsel began to suspect that Plaintiff Arjun Vasan (“Plaintiff” or “Vasan”) was improperly providing legal assistance to third parties. Checkmate’s counsel thereafter warned Plaintiff of the potential consequences of any such unauthorized practice of law.

3. On August 15, 2025, Checkmate’s counsel informed Plaintiff that “[i]f you interfere in any way or prepare documents for these individuals, we will seek and obtain additional sanctions against you for that conduct.”

4. Attached hereto as **Exhibit 1** is a true and correct copy of the August 15, 2025 email correspondence from Checkmate’s counsel to Plaintiff.

5. On October 1, 2025, Checkmate’s counsel informed Plaintiff that “because it appears that you may be attempting to manipulate and provide pseudo-legal ‘advice’ to at least some third parties, we again remind you that you are not a lawyer, that there are very serious consequences associated with behaving as if you are one . . .”

6. Attached hereto as **Exhibit 2** is a true and correct copy of the October 1, 2025 email correspondence from Checkmate’s counsel to Plaintiff.

I declare under the penalty of perjury under the laws of California that the foregoing is true and correct.

1 Executed this 6th day of November, 2025 in Los Angeles, California.

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